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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DANIEL LUCERO,

Plaintiff,

v.

ISABEL GUZMAN, ADMINISTRATOR
and SMALL BUSINESS
ADMINISTRATION,

Defendants.

Case No. 2:21-cv-00915-RFB-MDC

**Stipulation and Order to Extend Time to
Reply to Plaintiff's Response [ECF No.
85] to Federal Defendants' Motion for
Summary Judgment and to File a Joint
Pre-Trial Order [ECF No. 78]**

(Third Request)

Pursuant to LR IA 6-1 and LR 26-3, the parties request an extension from October 4, 2024, to October 18, 2024, of the deadline for Federal Defendants to file a reply to Plaintiff's Response [ECF No. 85] to Federal Defendants' Motion for Summary Judgment [ECF No. 78]. The extension is necessary because undersigned counsel for Federal Defendant has a heavy motion load, including a response to a countermotion for summary judgment, a motion for summary judgment, a motion regarding ghost writing, an expert deposition, preparation of settlement evaluation memorandum, and participation in settlement negotiation over the next two weeks. Accordingly, the parties, through counsel, stipulate and respectfully request that the deadline to file a reply to the Plaintiff's response is extended to **October 18, 2024**.

The parties, through counsel, also respectfully request the joint pretrial order date, currently set for October 4, 2024, be extended to October 18, 2024, to maintain the matched filing deadlines set out in ECF Nos. 84 and 94.

1 This is the third request to extend Federal Defendants' time to reply to Plaintiff's
2 Response [ECF No. 85]. This stipulation is submitted in good faith and not for purpose of
3 undue delay.

4 Respectfully submitted this 17th day of September 2024.

5 BLACK & WADHAMS

JASON M. FRIERSON
United States Attorney

6 /s/ Rusty Graf, Esq.

/s/ Virginia T. Tomova

7 RUSTY GRAF, ESQ.

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8 Nevada Bar No. 6322

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9 *Attorney for Plaintiff*

10 **IT IS SO ORDERED:**

11 **DATED:** September 18, 2024.

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14 **RICHARD F. BOULWARE, II**
15 **UNITED STATES DISTRICT JUDGE**
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